



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 1, 2021

BY ECF

The Honorable Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Dennis*, 20 Cr. 623 (LGS)

Dear Judge Schofield:

The Government respectfully submits this joint letter pursuant to the Court's order, dated November 23, 2021 (Doc. No. 11), requesting that the parties propose a schedule for discovery and the filing of motions, and dates for a status conference in the above-captioned case. The discovery in this case includes, among other things, four different email accounts and an iCloud account belonging to the defendant that were seized pursuant to search warrants, as well as records obtained from numerous victims in this case. The discovery is not only voluminous, but it also presents privilege issues given that the defendant is an attorney and his alleged victims are former and current employees of the defendant's former law firm. The Government intends to produce the majority of discovery in this case by early January 2022, pursuant to a protective order that the parties are currently discussing and will propose to the Court shortly. Accordingly, the parties propose the following motion schedule: (1) defendant's pretrial motions due March 25, 2022; (2) the Government's response due April 15, 2022; and (3) the defendant's reply due April 25, 2022. The parties propose that a status conference be held the first week of May 2022.

The Government, with the defendant's consent, respectfully requests that time be excluded between now and the status conference to allow time for the Government to produce and for the defendant to review discovery, and to allow the parties time to engage in discussions regarding a potential pretrial resolution of this matter.

Respectfully submitted,

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